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From: Allison Castellan <allison.castellan@noaa.gov>
Sent: Mon 8/6/2012 4:20:19 PM
Subject: Re: Fw: Review of draft Forest Roads Management Approach
 Sediment TWG Feedback Form forest roads draft proposal AC comments.docx

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Dave/Helen--

My comments on OR's sediment proposal are attached. I focused my comments on whether or not I felt the proposal would enable OR to satisfy its remaining CZARA condition for additional management measures for forestry and defer to EPA and NMFS on the specific technical issues.

Overall, I think the proposal has merit and is in line with previous recommendations NOAA and EPA have provided OR to meet the CZARA condition. However, its still not clear to me if the proposed road inventory and schedule for addressing the issues would cover all forest roads or just those pre-FPA. I don't believe just limiting it to pre-FPA roads would address the CZARA condition.

If you have questions, let me know.

Cheers,
Allison

On Wed, Aug 1, 2012 at 11:29 AM, David Powers <Powers.David@epamail.epa.gov> wrote:

Attached below are: 1) the draft OR DEQ proposal for addressing sediment from forest roads for the mid-coast IR TMDL and 2) a feedback form for the sediment technical workgroup. I'd suggest looking at the feedback form before looking at the proposal.

The proposal has implications for OR's TMDL program, the EPA/NOAA CNPCP decision, and potentially for future regulation of logging road runoff.

Given Helen's forest road engineering background and role on the techical workgroup I'd recommend that she be the lead on developing EPA's input on the proposal. Alan, given his role on the mid-coast TMDL team, and Margaret, given her potential future role on logging road/402 issues (depending on the Supremes, Congress, and HQ) could add program relevant perspective. I'll take a look at it this week or early next week. Others input would also be welcomed.

OR DEQ would like comments by cob August 10th. Please get your comments to Helen by cob August 8th so she can incorporate them. thanks, Dave

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----- Forwarded by David Powers/R10/USEPA/US on 08/01/2012 07:36 AM -----

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Date: 07/31/2012 05:28 PM

Subject: Review of draft Forest Roads Management Approach

Greetings Sediment Technical Working Group members,

As discussed at July 18 meeting, please find attached a draft proposal for the Forest Roads Management Approach for the Mid Coast Implementation-Ready Total Maximum Daily Load. Also attached is a form to assist you in providing input on the draft proposed approach. For consistency's sake, we would appreciate if you could provide feedback on the form; however, please don't hesitate to contact me directly if you have additional thoughts or suggestions. Our goal is to make this approach adaptable to other road sectors (agriculture, county roads, and state highways) and to facilitate implementation; these will be topics of upcoming TWG meetings and work. The draft proposed Forest Roads Management Approach has been created by a work group of Oregon DEQ and Oregon Department of Forestry staff and managers and is intended to meet DEQ's goals for roads, as follows:

- Hydrologically disconnected (to the maximum extent practicable) using available BMPs and good design principles;
- Resistant to crossing and road prism failure and sediment delivery; and
- Proactively remediate locations with high or moderate risk of failure.

Review Requested: Please review the attached draft proposed Forest Roads Management Approach document and provide any suggested edits or modifications using the Feedback Form and return it to me at SEEDS.Joshua@deq.state.or.us by close of business on Friday, August 10th. As I will be on vacation the 9th and 10th, it would be greatly appreciated if feedback can be given earlier. I will compile your feedback, and we will review and discuss at the August 15th Sediment TWG meeting.

Thank you for your continued effort.

Thanks,
Josh

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(See attached file: Mid-Coast TMDL Forest Roads Proposal_draft.docx)(See attached file: Sediment TWG Feedback Form_forest roads draft proposal.docx)

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